

March 8, 2002

Dear Food Stamp Nutrition Education Program Coordinator:

We are happy to present the Fiscal Year 2003 Food Stamp Nutrition Education Program State Plan Guidance. This Guidance reflects changes made by stakeholders throughout this past year, as well as recent comments received by March 4, 2002.

FNS wishes to thank all respondents who provided insightful comments that have helped us make a more useful and meaningful guidance document. Should you have questions, please feel free to direct them to your FNS regional office.

/S/

Lou Pastura
Director
Program Accountability Division
Food Stamp Program

Enclosure

Food Stamp Nutrition Education Program Guidance for FY 2003

Highlights

Target Audience

The legislation and regulations governing the Food Stamp Program define the target audience for nutrition education exclusively as those persons “participating in or applying for” the program. This would primarily be people in households with gross incomes at or below 130 percent of poverty.

Consistent with legislation, we continue to urge nutrition education resources to be directed to people eligible for food stamps. However, this year’s guidance allows projects to be more inclusive of other low income persons with an approved waiver on a project basis.

Waivers

References to waivers and waiver requirements are now located in only one place, rather than throughout the document as was done in previous years. Information on waivers and their requirements are located in Appendix C, Cost Policy. As specified in last year’s guidance, we again stress the need for project-specific exclusivity waivers, since approvals must be based on the specific income demographics of a project’s target population. To be approvable, each waiver request must provide information to sufficiently demonstrate that the project’s target audience is generally low income, and that at least 50 percent of each project’s target audience has household incomes lower than 185 percent of poverty. Statewide or “blanket” waivers are not allowable.

Project

A definition of “project” is added to the definitions section.

Core Area-Emphasis on Dietary Quality

We reordered the list of core areas to reflect the general priorities we envision for the Food Stamp Nutrition Education Program, with first priority on improvement in dietary quality. This change conveys our intent that this core component be addressed in a comprehensive manner. Likewise, the placement of Systems and Environmental Change as the last core area recognizes the value of this component, but at the same time emphasizes that resources devoted to these activities need to be both reasonable and necessary. These costs are to be limited to those that support change (in the local systems, the community or the environment) that help Food Stamp Program recipients make healthy choices, but not the costs of the change itself.

Systems and Environmental Change

Additional examples of allowable and unallowable activities under this category are provided as a result of comments received.

Partnership Efforts

This year's guidance asks for a description of plans to coordinate, complement and supplement the nutrition education efforts of other programs serving a low income population.

Requirement for Public Education Message

Consistent with the key core element of food security that long has been a part of the guidance, we are requiring that a brief message of Food Stamp Program outreach and access be provided to recipients of the Food Stamp Nutrition Education Program for the benefit of those who are potentially eligible but not participating in the Food Stamp Program. This message must be provided but only in the context of nutrition education, and should briefly convey the availability, benefits and how to apply for the Food Stamp Program. Sample language and resources are provided.

At least three commenters thought that this new requirement would necessitate asking people for their household income. The guidance clarifies that seeking income information from individuals is not a necessary component of any aspect of nutrition education in the Food Stamp Program.

Announcement of the Food Stamp Nutrition Connection

A new appendix is added which provides information on a comprehensive new web site resource for nutrition educators in the Food Stamp Program, called the Food Stamp Nutrition Connection at <http://www.nal.usda.gov/foodstamp>. We have placed this information in an appendix to the guidance for your handy reference. The appendix also provides information on how to submit your materials for consideration to the site.

Additional Resources Added

Additional resources for nutrition education information and resources are added.

Submission of Newly Developed Materials

In our earlier version of this letter, we noted that this coming year's guidance will ask that you submit materials that you have developed in the past year with your final report for Fiscal Year 2003. We indicated that, among other uses, these materials will be used to "populate" the Food Stamp Nutrition Connection website. Based on comments received, we have dropped that requirement. In lieu of requiring you to send materials to FNS, the guidance invites States to provide their materials on a voluntary basis to the Food Stamp Nutrition Connection site.

Credit Statement

This year's guidance requires that the Food Stamp Program be credited as a funding source on newly developed materials, products, meetings or other goods and services. Sample language is provided. One commenter asked for a downloadable copy of the USDA logo for these purposes; unfortunately, we are unable to accommodate this good idea because there are restrictions on the use of the USDA logo. For your further information, we are working on a Food Stamp Program logo that may be available for this purpose in the future.

Staffing Information

It is no longer necessary to provide nutrition credentials of personnel staffing each project. (However, FNS regional staff may seek additional clarification if they have questions about the reasonableness of salaries, for example).

Data Collection

We continue to seek your recommendations for improvements which are meaningful, but not burdensome.

Final Reports

Due dates:

Based on comments received, we have changed the proposed due date for final reports from October 31 to November 30, with regional option of further extension. The guidance still calls for States to submit preliminary reports on Fiscal Year 2002 activities with their State Plan by August 15.

Content:

Submission of Newly Developed Materials

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Submission of Select Materials and Information

The guidance contains a request that State agencies provide information in their final report on a few initiatives of their choice in key focus areas of particular public interest. While we have dropped the idea that all newly developed materials must be submitted with the final report for Fiscal Year 2003, we are asking States to provide this information along with relevant sample materials for a few select initiatives which specifically focus one or more of the following:

- Efforts directed at increasing consumption of fruits and vegetables in low-income populations (including those focused on racial/ethnic groups);
- Interventions and activities that promote healthy weight (includes a nutrition and physical activity focus);
- Partnerships and collaborations that involve other programs serving low income people in planning and delivering nutrition education. (not limited to FNS programs)
- Nutrition education activities conducted in food stamp offices where food stamp eligibility assessment is completed.

In response to comments asking for clarification, States may use their discretion in determining which interventions to highlight. This information will be used to analyze and publicize the work the Food Stamp Nutrition Education Program is doing in key areas of public health emphasis. An optional format is provided in appendix A for State use.

Duration of Funding

The budget summary no longer asks for information on the duration of funding. This was not found to be useful information.

Allowable Cost Policy

Numerous allowable cost issues that have been publicly promulgated via policy memoranda throughout the past year have now been incorporated into the guidance for ease of reference. These include more specificity on time records and studies, and allowable alternatives, indirect cost plans and rates and charges for publicly owned space. These areas were identified by commenters as those most in need of clarification.

Exceptions for Waivers

Clarification has been added that persons participating in the Food Distribution Program on Indian Reservations and those that are Categorically Eligible for the Food Stamp Program consistent with July 14, 1999 program regulations which permit eligibility for the Food Stamp Program to certain people with incomes over 185 percent of poverty are considered to be Food Stamp Program participants for targeting purposes. No waivers are necessary.

Incentive Items

Incentive items are now termed as nutrition education reinforcement items to better reflect the nature of their intent.

Medical Nutrition Therapy

This guidance clarifies that special diet counseling and medical nutrition therapy are not allowable costs in the Food Stamp Nutrition Education Program because such activities are beyond the scope of the program. In response to commenters as to whether general nutrition education to people who may be on or need therapeutic diets is allowable, the guidance has been clarified to indicate that this is still allowable. One distinction that can be made is that medical nutrition therapy is directed to individuals and customized to each person's need. Prohibitions against medical nutrition therapy as an allowable cost do not preclude the delivery of general nutrition education.

Reimbursement of Personal Costs

This guidance restores to the allowable costs listing the reimbursement of personal costs (such as transportation and child care costs) for recipients to actively participate in focus groups and needs assessments and on advisory groups to inform and improve the effectiveness of the nutrition education program. This was inadvertently left out of the guidance last year and was allowable.

Definitions

Definitions for Federal Fiscal Year, Medical Nutrition Therapy, Public Education Outreach Message and Project are added to the definitions section, along with other less substantive definitions.

Conforming and Clarifying Changes

Numerous conforming and clarifying nonsubstantive changes are made in the guidance.

Commenter Questions

While the majority of comments were addressed in the guidance, some commenters raised questions which may be better addressed in conversations with FNS regional staff. If you feel your issue was not addressed, please direct your questions to your region for further information.

Hallman fc Nut Ed Guidance 2003 Cover Letter